

**EXHIBIT
A3**

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MARYLAND

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Kareem-Ali Muhammad

AUG 21 2012

Case No. 1:12-cv-00964-ELH

Plaintiff,

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

BY

v.

Financial Recovery Services, LLC (herein
"FRS"), et al**Plaintiff's First Set of
Interrogatories to Defendants.**

Defendants.

PROPOUNDING PARTY: Kareem-Ali Muhammad

RESPONDING PARTY: Financial Recovery Services

SET: One

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, plaintiff Kareem-Ali Muhammad serves on Financial Recovery Services, LLC ("FRS") the following interrogatories, which it must answer separately and fully, under oath, within thirty (30) days.

I. DEFINITIONS

As used in these Interrogatories, the words and terms set forth below are defined as follows:

A. "Describe", "specify", "explain" and/or "state" shall mean to set forth fully and unambiguously, using technical terms or words of art, if necessary, each and every fact relevant to the answer called for by the Interrogatory of which the defendants or its agents, employees or representatives have knowledge.

B. "Person" shall mean any and all: natural persons; business associates; corporations; partnerships; limited partnerships; joint ventures; estates; trusts; banks savings associations; governmental agencies, departments, commissions, boards or committees.

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1 C. "Agreement" means any common understanding reached by two or more people or
2 entities, whether written or oral, formal or informal.

3 D. "You" or "your" means the party separately answering these Interrogatories, together
4 with its wholly or partly owned subsidiaries, and its affiliates or parent companies, and each and every
5 other legal entity within its direct or indirect control or in which it holds any equity or other interests, as
6 well as its merged or acquired predecessors in interest (if any), its present and former officers, directors,
7 employees, agents, representatives, and any other persons or corporations acting in a consulting or
8 advisory capacity or acting or purporting to act on behalf of any of the foregoing. "You" includes your
9 company, entity, institution, agency, subsidiary(ies), parent corporation(s) and/or any of its branches,
10 departments, employees, agents, contractual affiliates, or otherwise connected by legal relationship, in
11 the broadest sense. You may also be referenced herein simply as "Defendants."

12 E. Whenever relevant, words in singular shall include the plural thereof. Whenever
13 relevant, use of the words "his", "him" or "he" shall include her, hers and she.

14 F. "Document(s)" means any written, printed, typed or other graphic material of any kind
15 or nature, and all mechanical, photographic, video, electronic or sound recordings in the defendant's
16 possession or control, or known by it to exist. It shall also mean all drafts non-identical copies of
17 documents by whatever means made. "Document(s)" shall mean and include any printed, typewritten,
18 handwritten or otherwise recorded matter of whatever character, including specifically, but not
19 exclusively, and without limiting the generality of the foregoing, letters, diaries, desk and other
20 calendars, memoranda, telegrams, posters, cables, reports, charts, statistics, envelopes, studies,
21 newspapers, news reports, business records, book of account(s) or other books, ledgers, balance
22 sheets, journals, personal records, personal notes, any piece of paper, parchment, or other materials
23 similarly used with anything written, typed, printed, stamped, engraved, embossed, or impressed upon
24 it, accountants statements, accounting records of any kind, bank statements, minutes of meetings or
25 other minutes, labels, graphics, notes of meetings or conversations or other notes, catalogues, written
agreements, checks, announcements, statements, receipts, returns invoices, bills, warranties,
26 advertisements, guarantees, summaries, pamphlets, prospectuses, bulletins, magazines, publications,
photographs, work-sheets, computer printouts, telex transmissions or receipts, teletypes, telefaxes, file
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folders or other folders, tape recordings, and any original or non-identical (whether different from the original by reason of any notation made on such copies or otherwise), carbon, photostatic or photograph copies of such materials. The term "documents" shall also mean and include every other recording of, or means of recording on any tangible form, any form of information, data, communication, or representation, including but not limited to, microfilm, microfiche, any records stored on any form of computer software, audio or video tapes or discs, digitally recorded disks or diskettes, or any other medium whatsoever.

For each "document" responsive to any request withheld from production by you on the ground of any privilege, please:

- (a) state the nature of the document (e.g., letter, memorandum, contract, etc.);
- (b) identify each author or sender of the document;
- (c) identify each recipient of the document;
- (d) state the date the document was authored, sent, and/or received; and

(b) (5)(E) I will explain in detail the reason such document is allegedly privileged.

“Communicate” or “communication” means every manner or means of disclosure or transfer or exchange of information of any kind whether oral or by document or whether face-to-face, telephone, mail, personal or any other means of delivery.

(I) "Identity" or identity, when used with respect to a natural person means to state his full name, present or last known address, present or last known position or business affiliation, all positions or business affiliations during the time period of these Interrogatories, and a general description of the business in which he is or was engaged in each such position.

(ii) "Identify" or "identity" when used with respect to any other entity means to state its full name, the address of its principal place of business and the name of its officers.

(iii) "Identify" or "identity" when used with respect to a document means to state the name and title of the document, the type of document (e.g., letter, memorandum, telegram, chart, etc.), its date, the person who wrote it, the person who signed it, the person to whom it was addressed, the person to whom it was sent, its present location, and its present custodian. If any such document was, but is no longer in the defendants's possession or subject to its control, state what disposition was made

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1 of it and explain the circumstances surrounding, and the authorization for, such disposition, and state
 2 the date or approximate date thereof. Documents prepared prior to the period covered by these
 3 Interrogatories but which relate or refer thereto are to be included.

4 (iv) "Identify" or "identity" when used with respect to any non-written communication
 5 means to state the identity of the natural person making and receiving the communication, their
 6 respective principals or employers at the time of the communication, the date, manner and place of the
 7 communication, and the substance of the communication.

8 (v) "Identify" or "identity" when used with respect to a meeting means to state the nature
 9 of the meeting (formal gathering, conversation, telephone call, etc.) to identify all persons participating,
 10 to provide the date, duration, location(s) and to state the substance of the discussion.

11 I. The words "and" and "or" shall each include "and/or."

12 J. The word "file," unless otherwise noted, means the account which you have associated
 13 with the Plaintiff and all records or documents related to such account

14 K. The word "complaint", unless otherwise noted, means the original and any amended
 15 complaint served by the Plaintiff in this action.

16 L. "Plaintiff" means Kareem-Ali Muhammad.

17 M. The words "Personal Identifiers" means a person's name or social security number or
 18 other unique data which identifies or is associated with a particular "person."

19 N. "Audit Trail" means a complete, detailed listing of each and every alteration, deletion,
 20 inquiry into, modification or other change to the credit account or profile as maintained in recorded form,
 21 in the broadest sense, by "you." The listing should include the identity, address, employer and title of the
 22 person(s) taking the action, the identity, address, employer and title of the person(s) authorizing the
 23 action, a detailed explanation of the action taken, the date of the action, the means used to effect such
 24 action, the location of origin of the action and the reason the action was taken.

25 O. "Data" means the physical symbols in the broadest sense that represent information,
 26 regardless of whether the information is oral, written or otherwise recorded.

27 P. "Data field" means any single or group of character(s), number(s), symbol(s) or other
 28 identifiable mark(s) maintained in a permanent or temporary recording which represent, in any way, an

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1 item or collection of information. "Data field" includes all types of data whether maintained in integer,
2 real, character or Boolean format.

3 Q. "Database" or "databank" means any grouping or collection of data field(s) maintained,
4 in any format or order, in any permanent or temporary recorded form.

5 R. "Hardware" means the physical components of a computer or any device capable of
6 maintaining recorded data.

7 S. "Software" means the entire set of computer programs, procedures, documentation, or
8 other recorded instructions which guide a mechanical device or human in the operation of the computer
9 or mechanical device.

10 T. "Computer" means any and all programmable electronic devices or apparatuses,
11 including hardware, software, and other databanks; that can store, retrieve, access, update, combine, rearrange, print, read, process or otherwise alter data whether such data maintained in that device or at some other location. The term "computer" includes any and all magnetic recordings or systems; systems operating on or maintaining data in digital, analog, or hybrid format, or other mechanical devices, or other devices capable of maintaining writings or recordings, of any kind, in condensed format, and includes any disk, tape, recording, or other informational source, regardless of its physical dimension or size.

12 U. "Format" means the general makeup or general plan of organization or arrangement of data.

13 V. "Consumer identification information" means the information that a Person must provide to FRS in conjunction with a request for a consumer report that is used by FRS to identify the consumer on whom the information is to be furnished, as required by § 1681b(a).

14 W. "Proper identification" refers to the information and/or documentation that FRS requires from a consumer pursuant to § 1681h(a) before it will disclose to the consumer the information contained in the consumer's file.

15 II. INSTRUCTIONS

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1 A. The information requested is for all information known to the defendants, its officers,
2 directors, employees and available at the time of answering, including information in the possession of
3 its agents.

4 B. To the extent any information called for by these Interrogatories is unknown, so state,
5 and set forth such remaining information as is known. If any estimate or general description can
6 reasonably be made in place of unknown information, set forth the best estimate or general description,
7 clearly designating the answer as such, in place of unknown information, and the basis upon which the
8 estimate or general description is made.

9 To the extent any Interrogatory is objected to, set forth all reasons for the objection(s). If any
10 claim of privilege is asserted as a ground for not answering any Interrogatory, whether in whole or in
11 part, describe the factual basis for such claim in sufficient detail so as to permit the court to adjudicate
12 the validity of the claim.

13 C. These Interrogatories shall be deemed continuing, so as to require additional answers if
14 further information is obtained between the time answers are served and the time of trial. Such
15 additional answers shall be served from time to time; but not later than thirty (30) days after such
16 additional information is received.

INTERROGATORIES

18 Interrogatory No. 1 In chronological order for the period from January 1, 2010 to present,
19 state each address FRS has had in its files as plaintiff's address and the period(s) during which that
20 address was shown in FRS's file as plaintiff's *current* address.

22 Interrogatory No. 2 For each address listed in your response to Interrogatory No. 1,
23 identify the person or entity that furnished the information that caused FRS to list that address as
24 plaintiff's *current* address for that period of time.

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1 Interrogatory No. 3 In chronological order for the period from January 1, 2010 to present,
2 how many calls FRS made to 404-587-4382 and identify the person(s) or entity that called phone
3 number the 404-587-4382, with Proper identification and any information that FRS relied upon in calling
4 Plaintiffs Emergency telephone number.

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6 Interrogatory No. 4 Why did any individuals from FRS telephone Plaintiff?

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9 Interrogatory No. 5 Restate the contents of the telephone conversation between the
10 individual(s) or entity and Plaintiff.

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12 Interrogatory No. 6 With regard to the Debt allegedly owed by the plaintiff, itemize the
13 amount of each portion of the debt and the authority therefore.

14 Interrogatory No. 7 Identify by name, position, address and phone numbers of all
15 witnesses that defendants proposes to call to trial.

16 Interrogatory No. 8 List all documents Defendants proposes to use at trial.

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Interrogatory No. 9 Identify each person to whom the Defendants expects to call as an expert witness at trial, state the subject matter on which the expert is expected to testify and the substance of the facts and opinions to which the expert is expected to testify and a summary on the grounds for each opinion.

Dated: July 9, 2012

Respectfully submitted,

~~Kareem-Ali Muhammad, PRO SE
1615 E Cold Spring Lane
Baltimore, MD 21218~~